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*Via email and US Mail*

November 8, 2019

Ms. Kathryn Cerise, Superfund Project Manager  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, ECL-122  
Seattle, Washington 98101  
[cerise.kathryn@epa.gov](mailto:cerise.kathryn@epa.gov)

**Re: BNSF Comments on the September 2019 Proposed Plan for OU 1 for the Quendall Terminals Site**

Ms. Cerise,

Enclosed please find BNSF Railway Company's technical comments on the Proposed Plan for OU 1 for the Quendall Terminals Site.

As detailed in the attached comments, and as articulated by commenters at the public hearing, there are clear and substantive technical issues in the Proposed Plan that must be resolved. The Proposed Plan also substantially increases the cost of the remedy compared to the remedies evaluated in the Feasibility Study and approved by the National Remedy Review Board, and substantially increases the uncertainties regarding both cost and remediation timelines, all without appreciably reducing risk to human health or the environment.

The clear message from speakers at the public hearing, including developers, was that the increased costs, time and uncertainties associated with the Proposed Plan would make it highly unlikely that redevelopment of the property will occur. If redevelopment does not occur, cleanup will only be further delayed. Quendall Terminals is one of only 31 Superfund sites around the country identified as redevelopment opportunity sites, and one of only two in Washington State. Remedy selection at Quendall Terminals should therefore be designed to support redevelopment wherever possible while meeting CERCLA's remedy selection criteria. The Proposed Plan does not do this. If carried forward in the Record of Decision, the remedy described in the Proposed Plan would significantly impair or, more likely, prevent redevelopment. Final remedy selection for Quendall Terminals must reduce the uncertainties, time to implement, and, where possible, costs, in order to preserve the incredible regional redevelopment opportunity presented by the Site. Failure to do so will only lead to more delays and disputes, not timely cleanup, habitat restoration and upland redevelopment.

BNSF looks forward to working with EPA on the development of effective and appropriate remedial approaches at this important site.

If you have any questions, please contact me at 253-591-2567.

Sincerely,

Shane C. DeGross  
Manager Environmental Remediation

cc: Ted Yackulic, EPA Regional Counsel  
Tim Flynn, Aspect Consulting  
Lynn Manolopoulos, Davis Wright Tremaine

James Benedict, Cable Huston  
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